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March 15, 2018

VIA ECF

Hon. Steven M. Gold
United States District Court
Eastern District New York
225 Cadman Plaza
Brooklyn, New York 11201

Re.: Allstate Ins. Co. v. 21st Century Pharmacy, Inc., et al.
17-CV-03731 (WFK)(SMG); File No. L2597

Dear Judge Gold:

The Russell Friedman Law Group, LLC represents Defendants 21st Century Pharmacy, Inc. and Albert Alishayev ("Defendants") in connection with the above-referenced matter. We submit this letter further to this Honorable Court's Order of March 7, 2018 and provide a status on the non-party responses to the Plaintiffs' subpoenas.

As an initial matter, I wish to apologize to the Court and Plaintiffs. Undersigned counsel incorrectly calendared the response date for the subpoenas for today rather than March 14, 2018. Again, I apologize for undersigned's inadvertent calendaring error. There was no intent by the non-party entities or undersigned to ignore this Court's Order.

This firm also indicated that it represents the following non-party entities: Express Billing; AA 106-47 LLC; Anturio Marketing; New Business Group; DCRx Corp.; DRGD Marketing; F&A Enterprise; General Supply of New York; Healthpro Services; Martinez Silvero; Personal Tech; Rego Marketing; and BK Global.

Today, Express Billing, AA 106-47, DCRx Corp, F&A Enterprises, General Supply and Rego Marketing have served their respective responses to Plaintiffs' subpoena via USPS to Plaintiffs' counsels.

With respect to Personal Tech, this was an entity owned and operated by Albert Alishayev's father, Mikho Alishayev. Mikho Alishayev has been and continuous to be a resident at Grace Plaza Nursing Home after suffering a stroke. I am informed by Albert Alishayev, that his father is incapacitated and unable to communicate. As a result, Albert Alishayev has sought to identify and secure responsive documents to Plaintiffs' subpoena but has been unable. We would respectfully ask that Your Honor allow us some additional time to attempt to identify any responsive documents to Plaintiffs' subpoenas.



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With respect to DCRx Corp., undersigned was contacted today by Mr. Dani Kandov, president of DeRx Corp. He has informed me that he is out state in Florida and will not be back until Monday, March 19. Therefore, we would also request a brief extension of time within which DCRx Corp can respond to the Plaintiffs' subpoena. We similarly ask additional time for Healthpro Services and Martinez Silvero, to provide responses to Plaintiffs' subpoenas.

As to the entities New Business Resources Group, Inc., BK Global, Inc. and Anturio Marketing, Inc., we are now informed that these entities have retained other counsel for this matter. We confirmed today that Mr. Gary Tsirelman will be representing these entities. Further, it is my understanding that Mr. Tsirelman has already been in contact with Plaintiffs' counsel.

Therefore, it is respectfully requested that Your Honor grant some additional time for DCRx Corp., Personal Tech, Healthpro Services and Martinez Silvero to respond to Plaintiffs' subpoenas.

Thanking the Court for its time and consideration, I remain

Respectfully,
THE RUSSELL FRIEDMAN LAW GROUP, LLP

By: /S/ Pablo A. Fernandez
Pablo A. Fernandez

cc: Michael W. Whitcher, Esq. (*Via ECF Only*)
Smith & Brink, LLP
Attorneys for Defendants